

RICK A. YARNALL
CHAPTER 13 BANKRUPTCY TRUSTEE
701 Bridger Ave
Suite 820
Las Vegas, NV 89101
(702) 853-4500

E-FILED

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

IN RE:
LYNN CAMPBELL

CASE NO: BKS-18-12967-LEB

CHAPTER 13

Hearing Date: 8/9/2018

Hearing Time: 1:30 PM

HAINES & KRIEGER LLC
Attorney for the Debtor

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

Chapter 13 Bankruptcy Trustee, RICK A YARNALL, TRUSTEE, hereby objects to confirmation of the Chapter 13 Plan. The Debtor filed for Chapter 13 relief on 5/23/2018. The 341(a) Meeting of Creditors held on 7/3/2018 at 9:00 a.m. was concluded. The Trustee objects to confirmation of the plan for the following reason:

In order to complete his investigation into the Debtor's financial affairs, Trustee requires the following documentation:

- Verification of all sources of income received each month through confirmation of the plan;
- Bank Statements: Chase #5813: Oct 19th thru Nov 16th: missing page 4; Nov 17th thru Dec 18th: missing page 1; May 17th thru May 23rd; Chase #8107: May 12th thru May 23rd
- Other: Provide documentation as to source of large deposits and use of funds: Chase #5813: 2/8 \$1000;

These objections increase the Debtor's disposable income. Debtor's plan does not provide for all of Debtor's disposable income, therefore Trustee requests that confirmation of the plan be denied.

Trustee further opposes confirmation for the following reasons:

- Plan is not feasible;
- Plan does not provide for all secured and priority claims filed;

1 Trustee reserves the right to make further objections to confirmation and requests for documentation until the above
2 mentioned documents have been received, amendments have been made, and the plan is ultimately confirmed or
3 dismissed. In the event that the Debtor(s) fail to timely resolve Trustee's objection to confirmation, Trustee requests that
4 confirmation be denied.

5 Therefore, the Trustee objects to confirmation for the foregoing reasons and recommends that confirmation be denied.

6 DATED this 10th day of July, 2018.

7
8 /s/ Rick A. Yarnall

9 RICK A. YARNALL

10 Chapter 13 Bankruptcy Trustee

11 701 Bridger Ave, Suite 820

12 Las Vegas, Nevada 89101

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14 **CERTIFICATE OF SERVICE**

15 I hereby certify that I am an employee of RICK A. YARNALL, Chapter 13 Bankruptcy Trustee; that I am over the
16 age of 18 years; and that on the 10th day of July, 2018, I provided a copy of the Trustee's Opposition to
17 Confirmation of Plan Combined With a Certificate of Service to each of the following by:

18 [x] a. **ECF System:**
19 GEORGE HAINES igotnotices@hainesandkrieger.com; r52542@notify.bestcase.com
20 DAVID KRIEGER igotnotices@hainesandkrieger.com; nevadaign@gmail.com

21 [x] b. **United States mail, postage fully prepaid:**

22 LYNN CAMPBELL
23 3050 N. JONES BLVD. APT. 1093
24 LAS VEGAS, NV 89108

/s/ Cindy Coons
Cindy Coons, an Employee of
RICK A. YARNALL
Chapter 13 Bankruptcy Trustee